

Before the  
UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Competitive Product Prices  
Priority Mail Express International,  
Priority Mail International, First-Class Package  
International Service & Commercial ePacket  
Contract 2 (MC2020-157)  
Negotiated Service Agreements

Docket No. CP2020-173

PUBLIC REPRESENTATIVE COMMENTS ON  
NOTICE OF THE UNITED STATES POSTAL SERVICE OF FILING  
MODIFICATION TWO TO PMEI, PMI, FCPIS & COMMERCIAL  
EPACKET CONTRACT 2 NEGOTIATED SERVICE AGREEMENT

(May 24, 2022)

The Public Representative hereby provides comments pursuant to a Commission notice initiating this docket.<sup>1</sup> In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on the Postal Service's notice to file modification two to Priority Mail Express International, Priority Mail International, First-Class Package International Service and Commercial ePacket Contract 2.<sup>2</sup>

In Order No. 5568, the Commission approved the Postal Service's request to add a new product identified as Priority Mail Express International, Priority Mail International, First-Class Package International Service and Commercial ePacket Contract 2 to the

---

<sup>1</sup> Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, May 17, 2022.

<sup>2</sup> Notice of United States Postal Service of Filing Modification Two to Priority Mail Express International, Priority Mail International, First-Class Package International Service & Commercial ePacket Contract 2 Negotiated Service Agreement, May 16, 2022. (Notice)

Competitive Product List.<sup>3</sup> The modification revises Articles 2,3, 8, 10, 11, and 14 of the Agreement and adds Annexes 1B, 2B, 3B, 1C, 2C, 3C, 4B, and 5B to the Agreement. Notice at 1.

The Public Representative has reviewed the Postal Service's Notice and the supporting financial model filed under seal that accompanied the Notice. Based upon that review, the Public Representative concludes that Contract 2, as modified, should continue to generate sufficient revenues to cover costs and thereby satisfy 39 U.S.C. § 3633(a) and thus should be approved by the Commission.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

---

Jennaca D. Upperman  
Public Representative

901 New York Ave. NW  
Washington, DC 20268-0001  
202-789-6898  
jennaca.upperman@prc.gov

---

<sup>3</sup> See Order No. 5568 Order Adding Priority Mail Express International, Priority Mail International, FirstClass Package International Service & Commercial ePacket Contracts to the Competitive Product List, Docket No. MC2020-157 and CP2020-173, June 26, 2020.